

**SUPPORTING STATEMENT
Form ACF-196T
TANF FINANCIAL REPORTING FORM FOR TRIBES**

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) is authorized to collect and report the information requested under this form by the Block Grants to States Temporary Assistance for Needy Families. Implementing regulations at 45 CFR Part 286.255 (C) for tribes indicates the requirements for financial reports as necessary.

2. Purpose and Use of the Information Collection

Tribal agencies with approved Tribal plans for implementation of the TANF program report the data on an annual basis. Failure to collect this data would seriously compromise ACF's ability to monitor expenditures.

3. Use of Improved Information Technology and Burden Reduction

ACF has developed a forms database that allows electronic data entry for the ACF-196T over the internet. In addition, an electronic copy of the ACF-196T form is available via the internet within the Online Data Collection system.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected in this report is/will not be available through any other Federal source. No similar available information has been identified.

5. Impact on Small Businesses or Other Small Entities

These forms apply only to Tribal governments. Small businesses are not involved.

6. Consequences of Collecting the Information Less Frequently

Financial management of the program would be seriously compromised if the expenditure data were collected on a less than quarterly basis. Federal policy presumes the strictest controls on funding documentation in support of claims for reimbursement.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

No special circumstances are noted for this request for information collection.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The Federal Register Notice soliciting comments on the information collection was published April 20, 2016 (81 FR 23301). No comments were received in response to this Notice.

9. Explanation of Any Payment or Gift to Respondents

No provision for payment or gift to respondents applies to this collection.

10. Assurance of Confidentiality Provided to Respondents

There are no data collected that require confidentiality.

11. Justification for Sensitive Questions

Data collected are not of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
ACF-196T Financial Reporting Form for Tribes	72	4	1.5	432

There are 72 respondents, each providing 4 responses per year, requiring an estimated 1.5 hours per response, which equals a total of 432 burden hours requested. At an hourly rate of \$19.18 per hour, this will cost \$8,286. (The hourly rate of pay is based on the current year Federal General Schedule, "Rest of U.S." hourly rate of pay for a GS-07, Step 1 employee.)

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

No additional costs should be associated with this collection that is not contained in questions 12 and 14.

14. Annualized Cost to the Federal Government

The estimated costs to the Federal Government includes the initial electronic publication and database mapping for retention of information and submission which costs are estimated at approximately \$19,500 (or \$6,500 per year x three years).

Beginning in FY 2013, ACF enacted a requirement for the electronic filing of financial reports for all grantees. After some initial difficulties, all 72 Tribal TANF grantees are now each submitting Form ACF-196T through ACF's On Line Data Collection system (OLDC).

We estimate it requires approximately 30 minutes of Federal staff time to access, review, analyze and approve each online submission from each respondent. At the hourly rate of \$28.39 per hour, this will cost \$4,088 (72 respondents x 4 responses x 0.5 hours per response x \$28.39). (The hourly rate of pay is based on the current year Federal General Schedule, "Rest of U.S." hourly rate of pay for a GS-11, Step 1 employee.)

When combined with publication and database mapping costs, above, the estimated total annual cost to the Federal government is \$23,588.

15. Explanation for Program Changes or Adjustments

No change was required to this form because the ARRA column is still needed to track the ARRA expenditures for this program.

16. Plans for Tabulation and Publication and Project Time Schedule

There is no plan to publish information collected as a result of this form.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

We will display the expiration date on the form.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

We are not aware of any exceptions.

B. Statistical Methods (used for collection of information employing statistical methods)

Statistical methods are not included in this collection of information.